

Hunter & Mow, P.C.

A Professional Corporation of Attorneys at Law

ORIGINAL

1620 I Street, N.W.
Suite 701
Washington, D.C. 20006
(202) 293-2500

Writer's Direct Dial Number

Facsimile: (202) 293-2571

(202) 293-2500

June 3, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

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JUN 3 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

**Re: Ex Parte Presentation of the
Telecommunications Resellers Association
CC Docket Nos. 96-61, 96-68; May 31, 1996**

Dear Mr. Caton:

On May 31, 1996, the undersigned, along with Mr. Robert T. Hale, Sr., and Mr. Ernest B. Kelly, III, the Chairman of the Board of Directors and the Executive Director, respectively, of the Telecommunications Resellers Association, met with Regina M. Keeney, Chief of the Common Carrier Bureau, A. Richard Metzger, Jr., Deputy Bureau Chief of the Common Carrier Bureau, and Richard K. Welsh, Chief of the Common Carrier Bureau's Policy and Program Planning Division, to discuss matters raised in TRA's Comments and Reply Comments in CC Docket Nos. 96-61 and 96-68.

Two copies of materials distributed at that meeting are attached hereto.

Respectfully submitted,



Charles C. Hunter

Attachment

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TELECOMMUNICATIONS RESELLERS ASSOCIATION

OFFICE OF SECRETARY

MAY 31, 1996

CC Docket No. 96-61: Proposal to Adopt 'Mandatory Detariffing' Policy

Key Issues: Undermines Resale, "General Availability" and Non-discrimination Policies

Adverse impact on Competition and Consumers

Administrative Costs and Burdens

Permissive Detariffing: Worst Case Scenario for Resale

Preferred Solution: Relaxation of Tariffing Requirements

Bifurcated Structure

"Grandfathering" and "Fresh-Look"

CC Docket No. 96-98: Implementation of Local Competition Provisions

Objectives: Viable Opportunities for Small and Mid-Range Providers to Engage in Traditional "Total Service" Resale and "Virtual Network" Operation in Local Telecommunications Market

Deployment of Multiple "Physical" Local Networks

Recommendations: Commission Development of Comprehensive National "Blueprint," as well as Detailed Implementing Regulations

Unrestricted Resale Opportunities/Adequate Margins/Operational Support

Unrestricted Right to Acquire Unbundled Network Elements/Aggressive Unbundling/"Forward-Looking," Efficient, Incremental Costing/Non-discriminatory Access

Principal Concern: "Gaming" of the System by Incumbent LECs in the Market, in Negotiations, in the State Regulatory Arena

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TELECOMMUNICATIONS RESELLERS ASSOCIATION 1996

MAY 31, 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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 - Adverse impact on Competition and Consumers
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 - "Grandfathering" and "Fresh-Look"

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